

John G. Balestriere\*  
Matthew W. Schmidt (Cal. Bar No. 302776)\*  
**BALESTRIERE FARIELLO**  
225 Broadway, 29th Floor  
New York, New York 10007  
Telephone: (415) 966-2656  
Facsimile: (212) 208-2613  
john.balestriere@balestrierefariello.com  
matthew.schmidt@balestrierefariello.com  
*Attorneys for Plaintiffs*  
*\*Admitted Pro Hac Vice*

Anastasia Mazzella (Cal. Bar. No. 245201)  
**KABATECK LLP**  
633 West Fifth Street, Suite 3200  
Los Angeles, California 90071  
Telephone: (213) 217-5007  
Facsimile: (213) 217-5010  
am@kbklawyers.com  
*Attorneys for Plaintiffs*

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

JULIA HUBBARD, et al.,  Plaintiffs,  vs.  TRAMMELL S. CROW, JR., et al.,  Defendants.	Case No. 2:22-cv-7957-FLA- MAA  <b>DECLARATION OF MATTHEW W. SCHMIDT IN SUPPORT OF PLAINTIFFS' RESPONSE TO THE ORDER TO SHOW CAUSE</b>
---	---

1 I, MATTHEW W. SCHMIDT, an attorney admitted pro hac vice in the  
2 Central District of California, of legal age and under penalty of perjury,  
3 declare the following:

4 1. I am a partner with the firm Balestriere Fariello, and I represent  
5 Plaintiffs Julia Hubbard ("Hubbard") and Kayla Goedinghaus  
6 ("Goedinghaus") in the above-captioned action. I submit this declaration in  
7 support of Plaintiffs' Response to the Order to Show Cause.

8 2. The Central District of California is more familiar with the  
9 TVPA than any alternative district in Texas, having heard more than twice  
10 as many cases under 18 U.S. Code § 1591 than either the Northern or  
11 Western Districts of Texas.

12 3. I performed research via Westlaw and found that the Central  
13 District of California has decided 44 cases involving the TVPA, compared  
14 to only 19 in the Northern District of Texas and 18 in the Western District of  
15 Texas.

16 4. All Defendants have substantial contacts with the State of  
17 California due to the presence of Defendant Eller, a key part of the Venture,  
18 in this District.

19 5. All Defendants either knew or recklessly disregarded the  
20 presence of Eller in California and his key role in the Venture, thus  
21 purposefully directed activity to California.

22 6. I performed a web search to confirm that travel from Texas to  
23 Los Angeles does not present any burden: to the extent that travel is  
24 necessary, flights from Dallas to Los Angeles are typically under \$300 and  
25 only about three hours.

26 7. Attached hereto as Exhibit A is a true and correct copy of a map  
27 of the Defendants' addresses in Texas.  
28

1  
2 Dated: March 24, 2023  
3

4 By: 

5 John G. Balestriere\*

6 Matthew W. Schmidt (Cal. Bar No.  
7 302776)\*

8 BALESTRIERE FARIELLO

9 225 Broadway, 29th Floor

10 New York, New York 10007

11 Telephone: (415) 966-2656

12 Facsimile: (212) 208-2613

13 john.balestriere@balestrierefariello.com

14 matthew.schmidt@balestrierefariello.com

15 *Attorneys for Plaintiffs*

16 *\*Admitted Pro Hac Vice*  
17

18 Anastasia Mazzella (Cal. Bar. No. 245201)

19 **KABATECK LLP**

20 633 West Fifth Street, Suite 3200

21 Los Angeles, California 90071

22 Telephone: (213) 217-5007

23 Facsimile: (213) 217-5010

24 am@kbklawyers.com

25 *Attorneys for Plaintiffs*  
26  
27  
28